

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2016 NOV 21 P 4:03

DEPUTY CLERK 

UNITED STATES OF AMERICA, *et. al.*  
*ex rel.*, VERONICA GARCIA,

Plaintiffs,

v.

TRUNG MINH TANG, *et. al.*,

Defendants.

Civil Action No. 3:12-CV-2126-M

FILED IN SEALED CASE

**NOTICE OF FINAL SETTLEMENT AND  
JOINT MOTION TO STAY CASE FOR 45 DAYS**

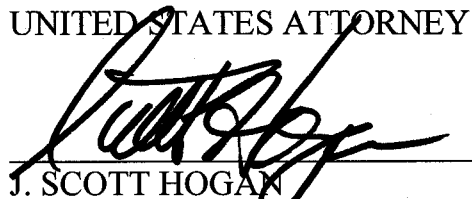
As the government represented to the Court in the United States of America's Notice of Election of Intervention for Purpose of Settlement, the parties previously negotiated a settlement in principle and needed time to obtain the necessary authority for resolution and agree upon a final settlement agreement. Save and except for Relator's statutory claim for attorney's fees/costs/expenses under 31 U.S.C. § 3730(d), the parties have agreed upon a final settlement agreement and are collecting signatures on that agreement. Notably, under the terms of the settlement agreement, defendants are permitted 30 days from the date of final signature to pay the United States the full settlement amount. The United States and State of Texas respectfully request that the Court stay this matter for 45 days, through and including January 5, 2017, to allow: (1) the parties to collect all of the required signatures on the settlement agreement (which includes four government entities and over 45 defendants); (2) the defendants to make the

payments due under the settlement agreement; and (3) the parties to file the final dismissal papers with the Court.

Counsel for the United States has conferred with counsel for Relator and counsel for the defendants and they do not oppose the relief requested herein.

Respectfully submitted,

JOHN R. PARKER  
UNITED STATES ATTORNEY



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Attorneys for the United States of America

**CERTIFICATE OF SERVICE**

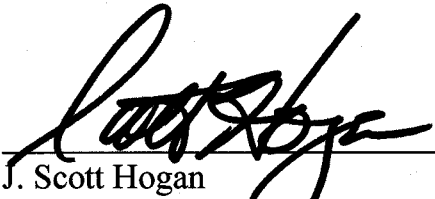
On November 21, 2016, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that a copy of the foregoing notice was mailed, first-class mail, to:

Mark Schlein  
Baum Hedlund Aristei & Goldman, PC  
12100 Wilshire Blvd., Suite 950  
Los Angeles, California 90025

  
\_\_\_\_\_  
J. SCOTT HOGAN  
Assistant United States Attorney

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with counsel for the Relator, Veronica Garcia, and counsel for defendants regarding this motion and they indicated that they do not oppose the relief requested in this motion.

  
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J. Scott Hogan  
Assistant United States Attorney